

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Rooterman, LLC)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 1:24-cv-13015
)	
Klodian Belegu, Quality Air Care)	
Corporation, RM Water Damage)	
Restoration LTD and 911 Sewer & Drain)	
Corporation.)	
)	
<i>Defendants.</i>)	
)	

DECLARATION OF JEFFREY M. ROSIN

Pursuant to 28 U.S.C. § 1746, I, Jeffrey M. Rosin, hereby state that new evidence has been uncovered that Defendants continue to use Plaintiff's trademarks and operate businesses in violation of this Court's April 11, 2025 Order.

1. First, Defendants have incorporated a new corporation on April 15, 2025, called "911 Plumbing and Restoration, Inc." with a d/b/a of "911 Sewer & Drain". Reportedly on such filing, Mr. Belegu's lawyer, Attorney Sandro Paterno is the owner of this corporation. (See Exhibit 1 hereto) Curiously, Attorney Paterno is the lawyer Mr. Belegu identified in his deposition as having incorporated all of Mr. Belegu's companies. (See Exhibit 2 hereto, K.Belegu Depo. Excerpt at pp. 74-75) Further, that corporation has, as Exhibit 1 shows, the same business address of all of Mr. Belegu's other defendant corporations, 1049 Church Road, Toms River, NJ. (Id. at p. 104) Attorney Paterno and Mr. Belegu admits that this business has been transferred to Attorney Paterno. (See ECF-59, 59-1, 59-2)

2. Second, Andrew Madore, who Defendants identified as their outside information technology and marketing vendor (see ECF 28-1; see also Exhibit 2, at p. 81) is reportedly the owner of the 911sewerdrain.com domain according to ECF-59-2, ¶ 5, lines 2-3. Mr. Madore has been Mr. Belegu's trusted vendor for his business and marketing matters for years. (Id.)

3. Based on Paragraphs 1 and 2 above and the exhibits therein, there appears to be a reformation or reorganization of Defendants' entities and their owners, to attempt to obfuscate the facts and responsibilities of Defendants by transferring business operations to one's trusted legal advisor and vendor reflects an intent to circumvent this Court's April 11 Order.

3. However, and third, on April 22, 2022, and as part of my ongoing fact investigation in this case, this 911 Sewer & Drain website and entity is still linked to Plaintiff Rooterman's trademarks. More specifically, I called the number on the website for 911 Sewer & Drain on that website, 800-295-5798 (see Ex. 13 to ECF-58), to determine if that company was still scheduling plumbing jobs to determine if there was compliance with this Court's April 11, 2025 Order. That company is still scheduling plumbing as the text exchange confirming the appointment shows. See Exhibit 3. However, I shortly thereafter on that same day called to cancel that job I scheduled, and Exhibit 3 hereto also shows that full text communications I received after scheduling and canceling the job. Aside from learning this information, upon that job being cancelled, I then received a text message attached hereto as Exhibit 4 from a different number. As it says: "*Hi Jeff! If you loved Rooter Man of NJ would you mind leaving us a review....*" That same text in Exhibit 4 provided a link to "click" to provide a review. Then, the two screen shots that come into view when I click that link are attached hereto as Exhibit 5, again reflecting Plaintiff's name and trademark, and the corporation, "Rooterman of New Jersey" that Mr. Belegu operated as a franchisee. (See Exhibit 6, M.Belegu Depo. Excerpt at pp. 35-36)

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 24th DAY OF
APRIL 2025.



Jeffrey M. Rosin